

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

*In re: Clearview AI, Inc. Consumer Privacy
Litigation*

Civil Action File No.: 1:21-cv-00135

Judge Sharon Johnson Coleman

Magistrate Judge Maria Valdez

PLAINTIFFS' UNOPPOSED MOTION TO AMEND JUDGMENT

Plaintiffs, individually and on behalf of the Settlement Class, hereby move to amend the Judgment entered by the Court on May 2, 2025 pursuant to Federal Rule of Civil Procedure 59(e). As grounds, Plaintiffs state as follows:

1. The Court granted final approval of the settlement in this matter via its Memorandum Opinion and Order dated March 20, 2025 (the “Final Approval Opinion”). Dkt. 631.
2. The Final Approval Opinion implicitly approved the award of attorneys’ fees and incentive awards for the named Plaintiffs requested in Plaintiffs’ Fee Petition. Dkt. 583. In particular, the Court rejected the objection that the 39.1% fee award was excessive, finding that “[t]he fee award is commensurate with the length and complexity of the case and the significant amount of time and effort Lead Class Counsel expended in their representation of the Settlement Class.” Dkt. 631 at 17. The Final Approval Opinion also rejected the objection to the requested incentive awards, finding that “[Objectors] do not provide any factual allegations to support their claim that Plaintiffs have not provided representation deserving of such an award.” Dkt. 631 at 18.
3. However, the Final Approval Opinion did not explicitly grant Plaintiffs’ Fee Petition. *See* Dkt. 631 at 36. Accordingly, for the avoidance of doubt as this matter proceeds to appeal,

Plaintiffs request that the Court's Judgment be amended to specify that Plaintiffs' Fee Petition is granted.

4. Plaintiffs' counsel has conferred with counsel for Defendants and Objectors, who have advised they take no position on the motion.

WHEREFORE, Plaintiffs respectfully request that the Court enter an Amended Judgment adding the following sentence: "The Court further finds that the attorneys' fees and incentive awards requested by Plaintiffs are reasonable, and accordingly grants Plaintiffs' Fee Petition (Dkt. 583)."

Dated: May 7, 2025

Respectfully submitted:

By: /s/ Thomas M. Hanson
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